

JE McHugh

Time to address a West Plains elephant: S3R3 Solutions - a Public Development Authority
<https://www.s3r3solutions.com/>

(S3 = Spokane City, Spokane County, Spokane Int'l Airport; R3 = Roads, Rails, Runways)

The Spokane International Airport (SIA), as a member of S3R3 Solutions PDA, owns +/- 9,000 acres of land surrounding its facility. Within the 9,000 acres are 300+ acres of wetlands.

Development of this large tract of land over time will potentially disrupt crucial wetland functions including stormwater infiltration, recharge of existing wells, and biologic diversity; PFAS contaminant transport and overall groundwater behavior will also be impacted across the West Plains.

Currently there's no targeted requirement for proposed development to effectively address surface/subsurface disturbance and overall landscape hardening (building footprint, roof runoff, impervious pavement). Subsurface disruption can also lead to water scarcity, a current problem on the West Plains.

The potential to increase the quantity and velocity of stormwater runoff and seasonal flooding that impacts basements, crawl spaces and roadways, are avoidable costs levied on homeowners and taxpayers. Over time, wetland disruption can also lead to concentration of contaminants in wells and in surface water reaching the Spokane River.

S3R3 Solutions marketing materials do not mention PFAS or wells. Solutions to future development impacts across the West Plains are not discussed in publications by Ecology or FAFB, or within the 20-year County comprehensive plan update currently underway. The Airport has not been heard from on this issue either, no surprise.

The S3R3 Solutions 'mitigation' approach to wetland disruption is proposed establishment of an off-site 'Harris Wetland Mitigation Bank', a collection of parcels equal to ~400 acres of "replacement" wetlands to be developed 24 miles south of Spokane - through the purchase of WMB 'credits' by developers within the PDA area. There is no predicting biologic function or financial success of this WMB.

In order to protect the hundreds of existing West Plains wells, 'foreseeable impacts' should be addressed up front through analysis of current data on PFAS levels across the SIA-FAFB impact areas. Suggested - a mechanism requiring a hydrogeological assessment within Ecology's Interim Action Plan and the final version of the SIA Enforcement Order.

When disrupted or eliminated, biologic diversity is curtailed, and wetlands no longer serve as wildfire reduction. Shouldn't DNR & WDFW weigh in on this, in detail?

If development aspirations are successful, will the Airport and the City-County co-owners be held responsible for future impacts to wells, if detected? As an agent of West Plains development, is S3R3 Solutions a responsible party if further contamination or water scarcity is introduced into our domestic wells as a result of development within the 9,000 acres?

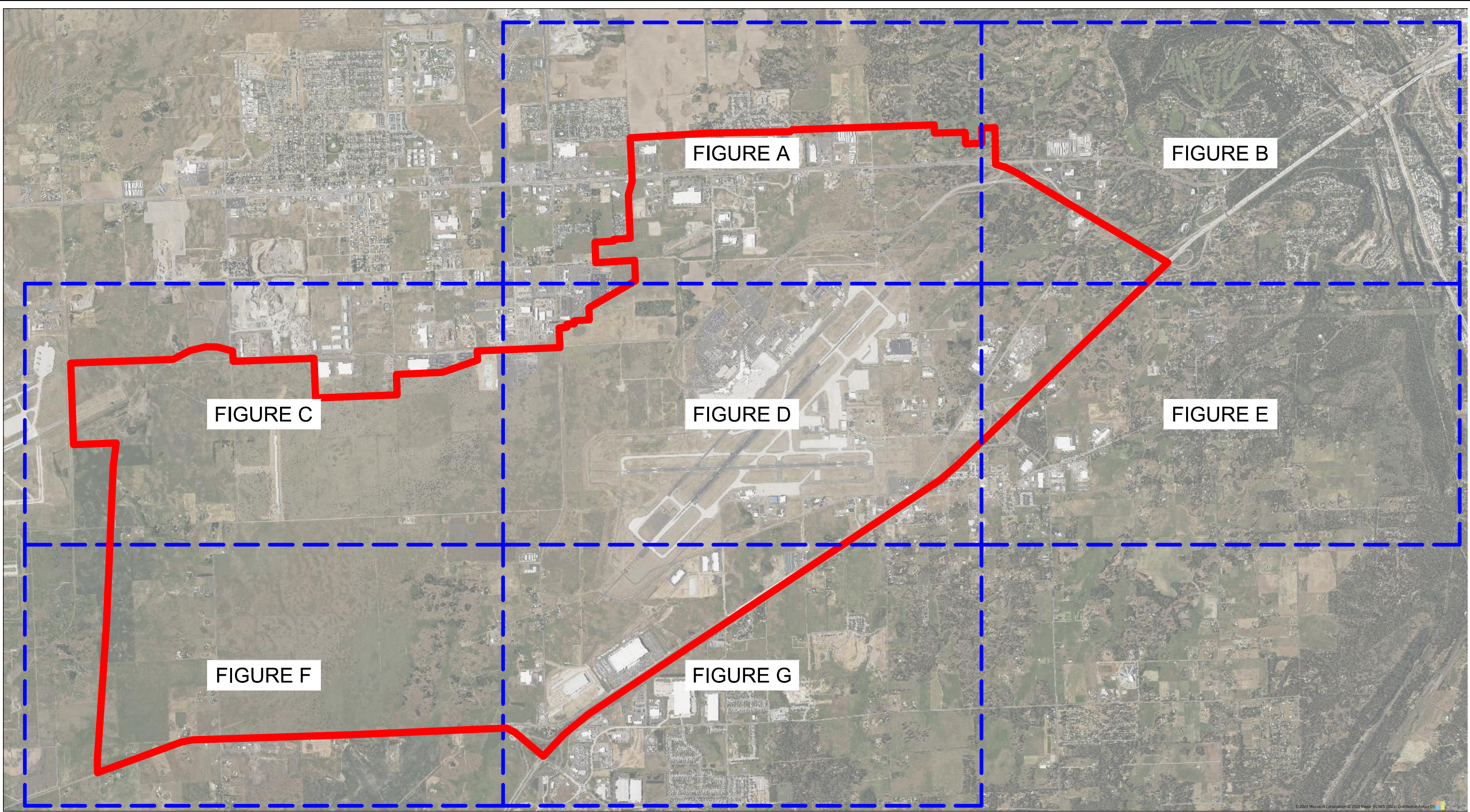
How will private well safety and protection be ensured into the future? The county's August 2026 West Plains Aquifer Protection Area vote cannot be counted on for this.

The S3R3 Solutions 'Wetland Inventory' .pdf is attached.



Respectfully submitted 6.18.2026

JE McHugh Palisades Neighborhood | West Plains

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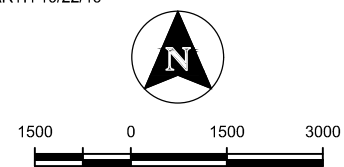


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY (9,200 ACRES)
-  INDEX VIEW FRAME

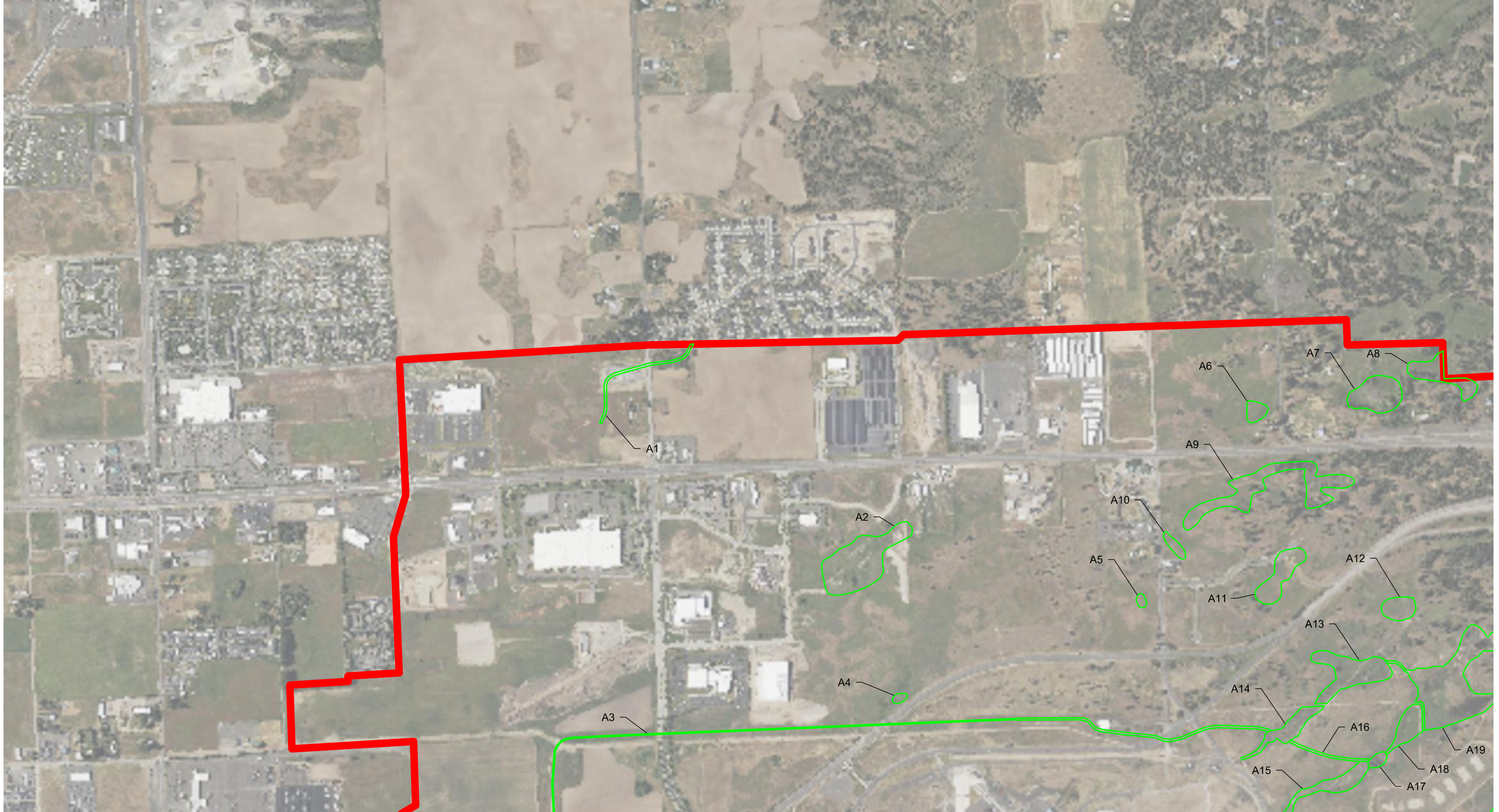
WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
SHEET INDEX

NOTE: AERIAL IMAGE OBTAINED FROM GOOGLE EARTH 10/22/19





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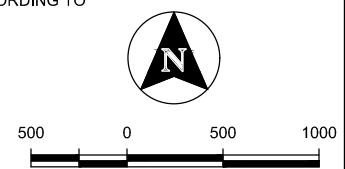


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
-  APPROXIMATE WETLAND BOUNDARY

**WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE A**

NOTE: ONLY WETLANDS WITHIN WEST PLAINS PDA ARE SHOWN.
WETLAND AREAS ARE DERIVED FROM THE NATIONAL WETLAND
INVENTORY (NWI) REFERENCE MAPS AND ADJUSTED ACCORDING TO
VISUAL AND/OR SITE OBSERVATIONS.





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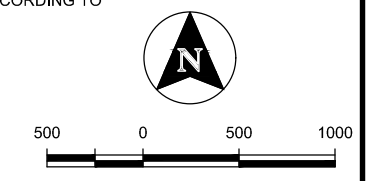


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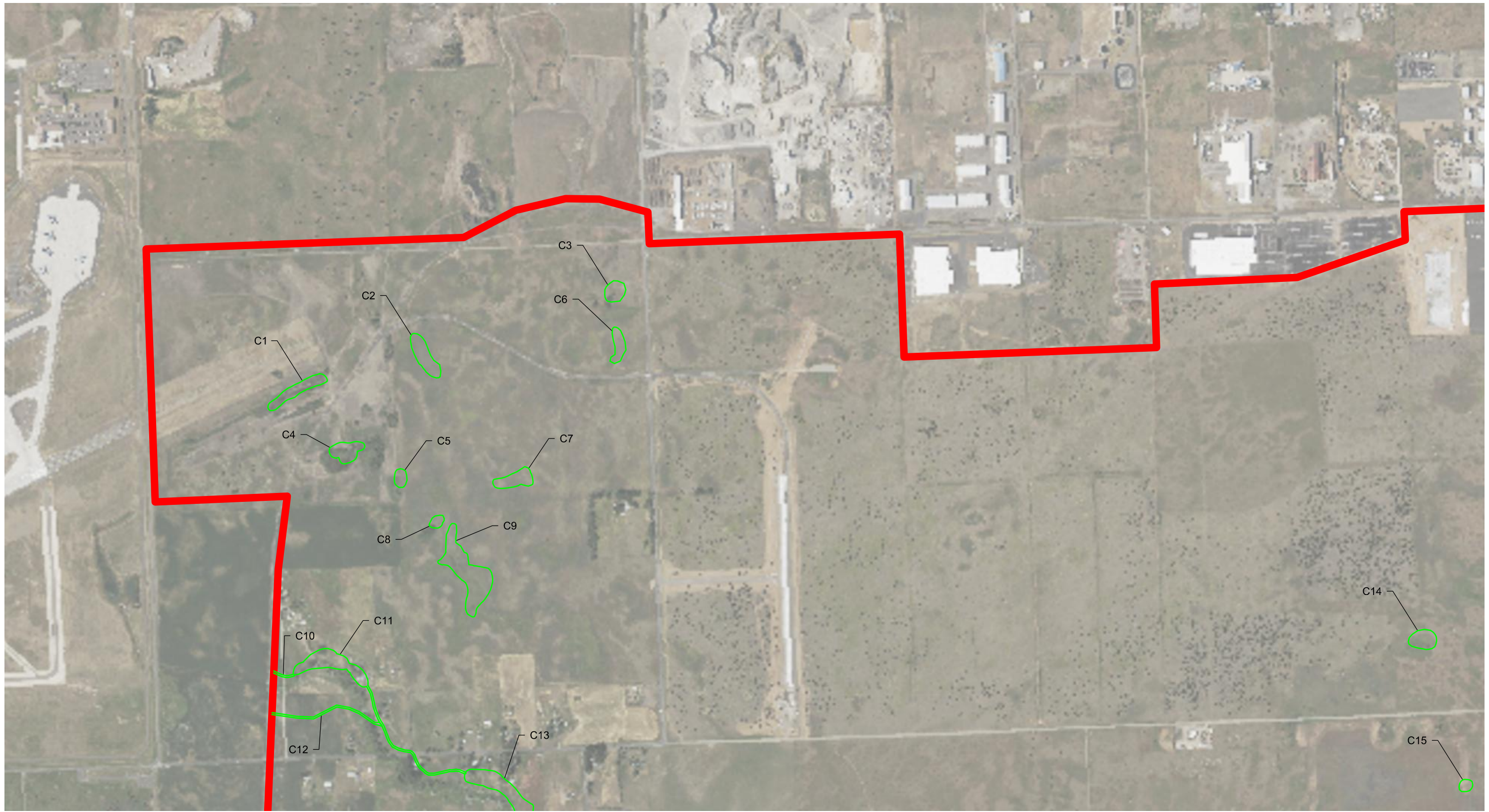
**WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE B**

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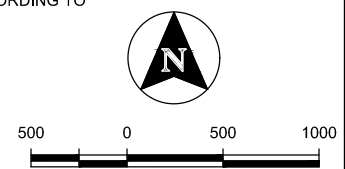


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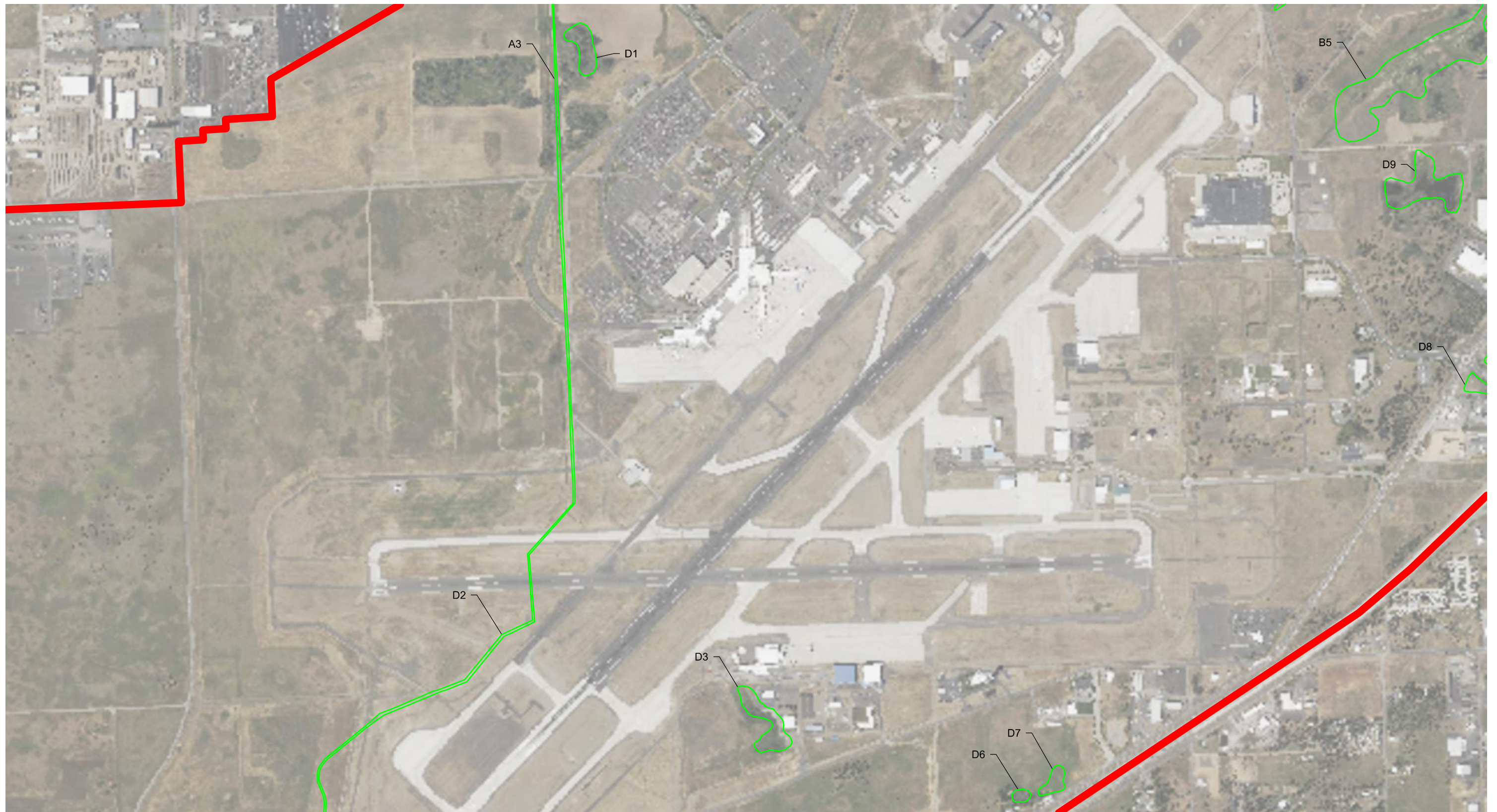
**WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE C**

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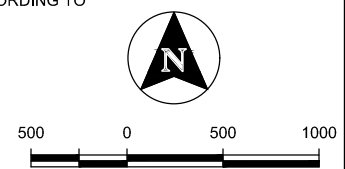


LEGEND

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**WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE D**

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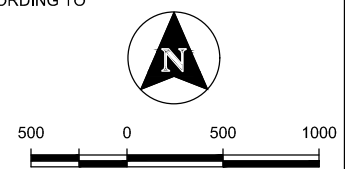


LEGEND

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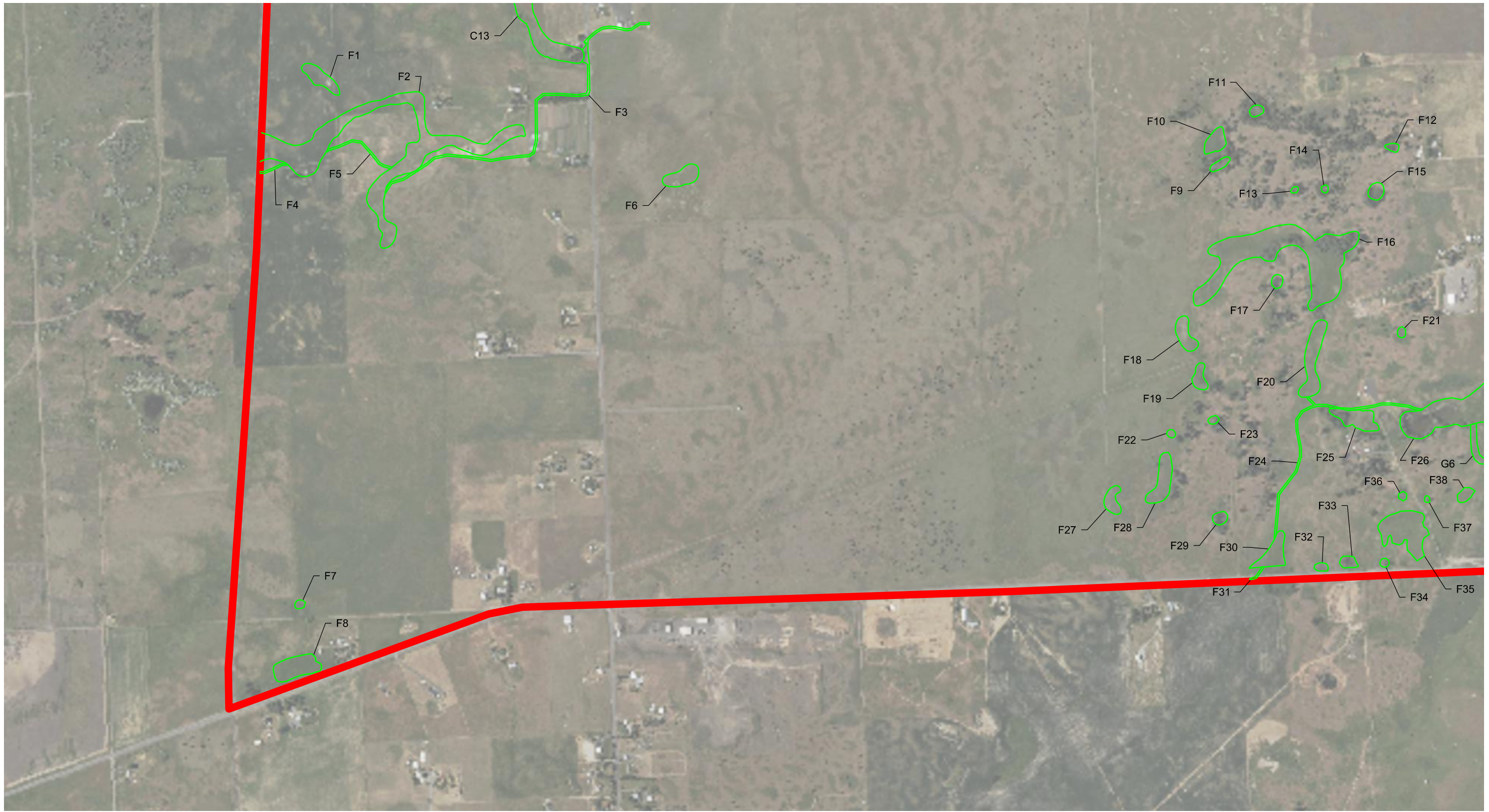
**WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE E**

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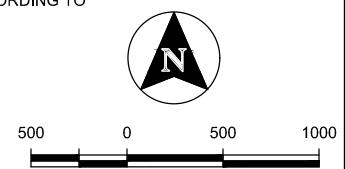


LEGEND

-  APPROXIMATE WEST PLAINS PDA BOUNDARY
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**WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE F**

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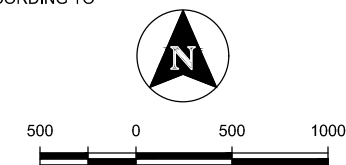


LEGEND

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**WEST PLAINS PDA
WETLAND INVENTORY EXHIBIT
FIGURE G**

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WETLAND SUMMARY TABLE				
WETLAND	CLASS	CLASSIFICATION	ESTIMATED ACREAGE	SUSPECTED CATEGORY
A1	RIVERINE	R5UBH	1.14	3
A2	FW EMERGENT WETLAND + POND	PUBHx, PAB4Hx, PEM1C	10.32	3
A3	RIVERINE	R5UBHx	7.63	3
A4	FW POND	PAB4Hx	0.35	3
A5	FW EMERGENT WETLAND	PEM1A	0.34	3
A6	FW EMERGENT WETLAND	PEM1F	1.13	3
A7	FW EMERGENT WETLAND	PEM1C	4.88	3
A8	FW EMERGENT WETLAND	PEM1A	3.55	3
A9	FW EMERGENT + FORESTED/SHRUB WETLAND	PEM1A, PSS1C	9.67	3
A10	FW EMERGENT WETLAND	PEM1A	0.82	3
A11	FW EMERGENT WETLAND	PEM1A	4.00	3
A12	FW EMERGENT WETLAND	PEM1A	2.14	3
A13	FW EMERGENT WETLAND	PEM1A	6.32	3
A14	FW EMERGENT + FORESTED/SHRUB WETLAND	PFO1A, PEM1A	3.03	3
A15	FW EMERGENT WETLAND	PEM1A	3.37	3
A16	RIVERINE	R5UBH	0.67	3
A17	FW FOREST/SHRUB WETLAND	PSS1C	0.68	3
A18	FW EMERGENT WETLAND	PEM1A	2.67	3
A19	FW EMERGENT WETLAND + RIVERINE	PEM1A, R5UBH	17.23	3
B1	FW EMERGENNT WETLAND	PEM1A	0.18	3
B2	FW FOREST/SHRUB WETLAND	PSS1C	1.63	3
B3	FW EMERGENNT WETLAND	PEM1C	7.54	3
B4	FW EMERGENNT WETLAND	PEM1C	2.37	3
B5	FW EMERGENNT WETLAND	PEM1A, PSS1A	31.75	3
B6	FW EMERGENNT WETLAND	PEM1C	1.96	3
B7	FW FOREST/SHRUB WETLAND	PSS1C	1.56	3
B8	FW EMERGENT WETLAND + RIVERINE	PEM1C, R4SBC	1.69	3
B9	FW EMERGENT WETLAND	PEM1C	11.47	3
B10	FW FOREST/SHRUB WETLAND	PSS1C	0.78	3
C1	FW POND	PUBHx	2.04	3
C2	FW EMERGENT WETLAND	PEM1A	2.12	3
C3	FW POND	PUBHx	1.14	3
C4	FW POND + FOREST/SHRUB WETLAND	PSS1C, PAB3H	1.71	3
C5	FW FOREST/SHRUB WETLAND	PSS1C	0.63	3
C6	FW EMERGENT WETLAND	PEM1A	1.14	3
C7	FW EMERGENT WETLAND	PEM1A	1.67	3
C8	FW FOREST/SHRUB WETLAND	PSS1C	0.47	3
C9	FW EMERGENT WETLAND	PEM1A, PEM1F	5.91	3

C10	FW EMERGENT WETLAND	PEM1Cx	0.13	3
C11	FW EMERGENT + FORESTED/SHRUB WETLAND + RIVERINE	PEM1A, PFO1A, R4SBC	4.44	3
C12	RIVERINE	R4SBC	0.72	3
C13	FW EMERGENT WETLAND + RIVERINE	PEM1Ad, R4SBC	7.90	3
C14	FW EMERGENT WETLAND	PEM1A	1.44	3
C15	FW EMERGENT WETLAND	PEM1A	0.44	3
D1	FW EMERGENT WETLAND	PEM1A	3.04	3
D2	RIVERINE	R5UBFx, R4SBC, R5UBH	5.24	3
D3	FW FOREST/SHRUB WETLAND	PSS1A	4.60	3
D4				
D5				
D6	FW EMERGENT WETLAND	PEM1C	0.63	3
D7	FW EMERGENT WETLAND	PEM1A	1.48	3
D8	FW EMERGENT + FOREST/SHRUB WETLAND	PEM1F, PSS1C	1.19	3
D9	FW POND	PUBHx	7.91	3
E1	FW EMERGENT WETLAND	PEM1A	1.42	3
E2	FW POND	PAB4H	0.69	3
E3	FW POND	PUBHx	0.63	3
E4	FW EMERGENT + FOREST/SHRUB WETLAND	PEM1F, PSS1C	0.52	3
F1	FW EMERGENT WETLAND	PEM1C	1.70	3
F2	FW EMERGENT WETLAND	PEM1C, PEM1A	20.71	3
F3	RIVERINE	R4SBC	2.58	3
F4	RIVERINE	R4SBC	0.18	3
F5	RIVERINE	R4SBC	0.47	3
F6	FW EMERGENT WETLAND	PEM1A	1.73	3
F7	FW EMERGENT WETLAND	PEM1C	0.24	3
F8	FW EMERGENT WETLAND	PEM1C	2.83	3
F9	FW EMERGENT WETLAND	PEM1C	0.52	3
F10	FW EMERGENT WETLAND	PEM1C	1.27	3
F11	FW EMERGENT WETLAND	PEM1C	0.41	3
F12	FW FOREST/SHRUB WETLAND	PSS1C	0.29	3
F13	FW EMERGENT WETLAND	PEM1C	0.12	3
F14	FW EMERGENT WETLAND	PEM1C	0.14	3
F15	FW EMERGENT WETLAND	PEM1C	0.70	3
F16	FW EMERGENT + FOREST/SHRUB WETLAND	PEM1A, PSS1A	17.85	3
F17	FW EMERGENT WETLAND	PEM1C	0.41	3
F18	FW EMERGENT WETLAND	PEM1A	1.49	3
F19	FW EMERGENT WETLAND	PEM1A	0.90	3
F20	FW EMERGENT WETLAND	PEM1C	3.36	3
F21	FW EMERGENT WETLAND	PEM1C	0.23	3

F22	FW EMERGENT WETLAND	PEM1A	0.18	3
F23	FW FOREST/SHRUB WETLAND	PSS1A	0.22	3
F24	RIVERINE	R4SBC	1.61	3
F25	FW EMERGENT WETLAND + POND	PEM1C, PEM1Fx, PUBHx	2.27	3
F26	FW EMERGENT WETLAND + POND	PEM1C, PEM1Fx, PUBHx	20.29	3
F27	FW EMERGENT WETLAND	PEM1A	1.08	3
F28	FW EMERGENT WETLAND	PEM1A	2.33	3
F29	FW EMERGENT WETLAND	PEM1C	0.51	3
F30	FW EMERGENT WETLAND	PEM1C	1.99	3
F31	RIVERINE	R4SBC	0.11	3
F32	FW EMERGENT WETLAND	PEM1C	0.31	3
F33	FW EMERGENT WETLAND	PEM1C	0.56	3
F34	FW EMERGENT WETLAND	PEM1C	0.21	3
F35	FW EMERGENT WETLAND	PEM1C	4.95	3
F36	FW EMERGENT WETLAND	PEM1C	0.19	3
F37	FW EMERGENT WETLAND	PEM1C	0.10	3
F38	FW EMERGENT WETLAND	PEM1C	0.57	3
G1	FW EMERGENT WETLAND	PEM1A	0.23	3
G2	FW EMERGENT WETLAND	PEM1A	0.59	3
G3	FW EMERGENT WETLAND	PEM1F	0.34	3
G4	FW POND	PUBHx	0.16	3
G5	RIVERINE	R4SBC	0.65	3
G6	RIVERINE	R5UBHx	3.79	3
G7	FW POND	PUBHx	1.34	3
G8	FW EMERGENT WETLAND	PEM1C	0.29	3
G9	FW POND	PUBHx	0.18	3
G10	FW POND	PUBHx	1.42	3
G11	FW EMERGENT WETLAND	PEM1C	0.14	3
G12	FW EMERGENT WETLAND	PEM1C	0.57	3
G13	DEPRESSIONAL WETLAND	PFO1A	0.50	2
G14	DEPRESSIONAL WETLAND	PEM1C	0.01	2
G15	DEPRESSIONAL WETLAND	PFO1A	3.50	2
TOTAL ESTIMATED WETLAND AREA (ACRES)			309.44	



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